

INTERIM CRITERIA TO EVALUATE TRAINING COURSES IN LEAD-SAFE WORK PRACTICES 2001

Background and General Information:

On September 15, 1999, the U.S. Department of Housing and Urban Development published the Lead Safe Housing Rule (LSHR) establishing updated standards and procedures for the evaluation and control of lead-based paint hazards in housing receiving Federal assistance, and in Federally owned housing being sold. The regulation became fully effective September 15, 2000, and is found at 24 CFR Part 35.

Section 35.1330 (a)(4) of the rule establishes training requirements for persons performing interim controls of lead-based paint hazards in affected properties. The LSHR is designed to ensure that persons performing interim controls, paint stabilization and lead-based paint maintenance are taught the seriousness of lead poisoning, are adequately trained in the specific work activities they will be performing (maintenance or renovation/remodeling), and are trained and/or supervised to do such work in a lead-safe manner so they protect themselves and the occupants.

These requirements differ from the U.S. Environmental Protection Agency training and certification requirements in 40 CFR Part 745 Subparts L and Q for persons performing "abatement" of lead-based paint or lead-based paint hazards. The HUD regulation requires that workers performing certain non-abatement activities including interim controls, paint stabilization and lead-based paint maintenance either: 1) receive hazard communication training and be supervised by a certified lead paint abatement supervisor or 2) successfully complete one of several lead safe work practices courses specifically named in the regulation or another course approved by HUD for this purpose after consultation with EPA.

Note: Specific HUD approval is NOT required if a training organization delivers (without substantive alteration beyond adding information discussed below) the courses specifically identified in the list of HUD-approved courses located at the Office of Healthy Homes and Lead Hazard Control web site, <http://www.hud.gov/offices/lead>.

As stated above, training providers may use an existing Lead Safe Work Practices course curriculum as specified in the Lead Safe Housing Rule, 35.1330(4)(i-ii). However, HUD recognizes that several of these courses were developed prior to issuance of some of the requirements listed in these interim training course criteria. Therefore, HUD requires that the training provider add information to the existing curricula on the following: 1) the Rule's requirements for maintenance and rehabilitation activities including interim controls, paint stabilization and HUD's clearance standards, 2) OSHA requirements and 3) State and/or local regulations in order to ensure the existing course used in LSWP courses meet these training criteria. The addition of this information to the courses to comply with these criteria is not considered "substantive alteration." Keeping training materials current is the responsibility of the training provider.

Several organizations have indicated an interest in obtaining HUD approval of a Lead Safe Work Practices course not specifically listed in the regulation that would meet its requirements. HUD encourages the use of existing approved courses. However, HUD is providing the following criteria as a guide for those who find it necessary to submit a draft curriculum to HUD for review and approval. Because this training is designed for individuals

not performing abatement activities, organizations should not submit to HUD their EPA- or State-accredited worker or supervisor training programs to meet this Lead Safe Work Practices training requirement.

Course Approval Process:

Training providers seeking HUD approval of a course should send three copies of the proposed course materials to:

Director, Office of Healthy Homes and Lead Hazard Control
U.S. Department of Housing & Urban Development

MAIL ADDRESS:
451 Seventh Street, SW, Room P-3206
Washington, DC. 20410

SHIPPING ADDRESS:
490 L'Enfant Plaza, Room 3206
Washington, D.C. 20024
202-755-1785

The course will be reviewed for consistency with these criteria. Submitting organizations will be notified of inconsistencies with the criteria or deficiencies, and the opportunity to revise their submittal. Following receipt and review of revised/corrected course materials or documentation of revisions being made as requested, a determination as to course approval or disapproval will be made. Once a course is approved, training providers should submit any alterations for approval prior to use.

Since the Lead Safe Housing Rule does not require on-site supervision of all employees performing activities taught in lead-safe work practices training, the quality and effectiveness of training programs is vitally important. Therefore, HUD recommends that individuals delivering this training be qualified by virtue of education and/or experience in the lead hazard identification and control field and in adult education.

HUD also recommends that courses be taught in the primary language of the student and that written materials be prepared at an instructional level that is easy for the student to understand, including the extensive use of graphics where appropriate. HUD highly recommends the incorporation of hands-on exercises, demonstrations and discussions into lead safe work practices training programs when feasible, given the instructional content and time constraints of the course. Finally, HUD recommends that lead safe work practices courses be delivered with an instructor:student ratio of no more than 1:25.

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A. Mandatory Course Topics

1. Limitations of lead-safe work practices training

This course does not qualify individuals to conduct lead-based paint (LBP) abatement, inspections, risk assessments, paint testing, soil sampling, dust sampling, clearance examinations or work specification development. Other courses and certification requirements may apply to these other activities.

Explanation of work activities to be performed after this training, and whether and how they will be limited by state and local restrictions.

2. Health Effects

- Sources of lead in the environment.
- How lead enters the body.
- Persons at risk.
- Signs, symptoms and effects of lead poisoning on children and adults.
- Acute vs. chronic exposure.
- Blood testing for lead level/poisoning.
- CDC level of concern and HUD definition of Environmental Intervention Blood Lead Level (EIBLL).

3. Lead-Based Paint and LBP Hazards

- HUD/EPA definition of lead-based paint.
- Consumer Product Safety Commission's ban of lead-based paint in 1978 for residential use.
- Explanation of "lead-based paint hazards" used under Title X:
 - deteriorated lead-based paint
 - dust-lead hazards
 - soil-lead hazards
- Distinction between the presence of lead-based paint and lead-based paint hazards.
- Renovation and repainting have been found to generate lead-contaminated dust that is ingested or inhaled by young children, other occupants and workers.
- Paint as a source of soil contamination.
- Age and condition of housing, and cleaning and maintenance practices affect how likely housing is to have lead hazards.
- Title X sections require Federal lead regulations
- HUD requirements for federally assisted and owned housing: 1012/1013.
- Scope of the Regulation, especially:
 - training/certification
 - occupant protection
 - clearance
- Interim Dust Lead Standards
- Activities disturbing areas that total more than de minimis levels require safe work practices and clearance examination.

4. Overview of each of the following:

- HUD-EPA Disclosure rule: 1018.
- EPA Pre-renovation education rule: 406(b).
- EPA training and certification rule: 402/404.
- OSHA lead-in-construction rule: 1031.
- And/or state or local lead-based paint requirements.
- Applicability of most stringent regulation.

5. Work Practices Specifically Prohibited by the HUD Lead Safe Housing Rule

- Open flame/high heat methods to remove paint (including heat guns over 1100 degrees Fahrenheit as well as torches)
- Power sanders or grinders without HEPA vacuum attachments
- Abrasive blasting or sandblasting without HEPA vacuum exhaust
- Extensive dry scraping or dry sanding
- Hazardous volatile paint strippers (including methylene chloride) in an inadequately ventilated space

6. Lead-Safe Work Practices

Dust containment:

- Set-up, materials and procedures for interior and exterior work.

Dust control methods during interim controls, paint stabilization and dust removal:

- Methods that minimize the amount of dust created and dispersed.
- Avoid prohibited practices.
- Use tools, supplies and practices (HEPA vacuum, emphasis on working wet) to minimize dust

Dust control methods for exterior work:

- Cover the ground with disposable polyethylene drop cloths; do not carry dust from one job to another by reusing drop cloths
- Contain all waste including paint chips and dust on exterior jobs
- Restrict access of occupants and visitors to work area

Soil-lead hazard control:

- Do not track existing soil-lead hazards to interior spaces
- Cover soil-lead hazards with mulch, gravel or landscaping

Specialized Cleaning Procedures:

- The very small amount of lead that constitutes a hazard
- Special cleaning materials, supplies, tools and procedures to remove containment materials and dust/debris created during the work.
- Procedures to remove containment materials and dust/debris created during work.
- 4-step cleaning procedure: pick up visible debris, HEPA vacuum, wet wash all horizontal surfaces and walls using an all purpose cleaner – include a rinse step, final HEPA vacuum.
- Emphasize need to clean up dust that may not be visible to the naked eye.
- Determining when a property is ready for clearance evaluation.

Disposal:

- Describe procedures for disposing of debris from the work.
- Include review of applicable Federal, state and local disposal or hazardous waste requirements including EPA policy statement on regulatory status of waste generated by contractors and residents from lead-based paint activities conducted in households
- Identify any permits, and tools and supplies needed for proper disposal.

Clearance Evaluation:

- Review when clearance is required by HUD.
- Address types of work and de minimis levels.

Two components of clearance examinations in the HUD regulations:

1. visual assessment and,
 2. collection/analysis of dust samples.
- Independence of Inspector/Risk Assessor or clearance/sampling technician from maintenance/rehabilitation/construction or abatement firm.
 - Clearance examination should be performed at least 1 hour after work is finished, but no later than 24 hours later.
 - Clearance is not achieved until satisfactory lab results are received.
 - Whole unit clearance required except for interior ongoing maintenance activities or units receiving less than \$5,000 in rehabilitation assistance, when worksite is contained, or for work less than de minimis amounts.
 - Response to inadequate cleanup and failure to meet clearance standards requires repeat cleaning and clearance testing of failed areas until compliance with clearance standards is achieved.
 - Relationship of Sampling Technician to Inspector/Risk Assessor; certification of Sampling Technicians; use of Sampling Technicians on various types of projects.

7. Occupant and Resident Safety

- Procedures to keep occupants, especially young children, out of work area until final cleanup/clearance is completed.
- Dust containment practices or moving occupants' belongings and furniture to minimize spread of dust.

8. Worker Safety

- Good hygiene practices.
- Existence and applicability of OSHA Hazard Communication, Lead in Construction, Respiratory Protection standards; and of State/local standards.
- Worker protection requirements are dependent upon the task being performed, the work practices being used and potential for exposure
- Protective clothing is required and what types should be worn; proper decontamination and cleaning of work clothes.
- Introduction to respiratory protection; use of respirators depends on exposure

9. Brief description of additional safety hazards to look for and personal protective equipment:

- Electrical hazards
- Slips, trips and falls (include ladder safety)

- Hazards to the eye and eye protection
- Chemical hazards
- Heat stress
- Fire prevention
- Test: Required to assess student knowledge of required course content

Test may be written or verbal in format.

Each participant must answer at least 70% of the questions correctly to pass.

Review correct answers of exam with participants.

Test development and administration is the responsibility of the training provider.

B. Additional Information and Recommendations for Training Providers

Course Length and Time Allocations

- This training should not take less than 6-8 hours of instructional time, excluding lunch and breaks.
- Demonstrations and/or hands-on training should be included whenever feasible.
- Approximately 50 percent of the course time should be allocated to topics 5,6,7.
- Proposed course schedule with time allocations should be included in course submittal for HUD approval.

To enforce this requirement for lead-safe work practices, HUD will evaluate training course effectiveness by determining whether or not workers who have completed the course and passed the test have the knowledge they need to do their jobs safely and properly. Training providers should keep records of individuals trained, test scores, copies of course completion statements, and a list of courses and training dates for a period of three years should HUD request this information as part of the enforcement process.

C. Course Materials

Each student should be provided written information on key course content to take with them after completion of the training. The HUD/EPA/CDC document, "Lead Paint Safety: A Field Guide for Painting, Home Maintenance and Renovation Work" should be distributed to students and instruction in its use should be provided as described in the "Field Guide." This document, an excellent training resource, is available from the National Lead Information Center by calling 1-800-424-LEAD, or it can be downloaded from the HUD Office of Healthy Homes and Lead Hazard Control's web site at <http://www.hud.gov/offices/lead>.

Post-training test (closed-book)

Statement of successful completion of training program with student's name, printed name of the training provider and signature of the instructor. The statement should also include the address and telephone number of the training provider, course title, duration, date and location.